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AT GREENBELT
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND

DEPUTY

Kenneth M. Robinson, Esq.
May 26, 2011
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BY

ATTACHMENT A-STATEMENT OF FACTS

The undersigned parties hereby stipulate and agree that if this case had proceeded to trial, government would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.

At all times relevant to this case, defendant **JOHN SHUTT**, was a resident of Bowie, Maryland.

Between February 7th and 8th of 2010, **SHUTT** distributed images depicting children engaged in sexually explicit conduct to an illegal website where users could distribute and download child pornography. The following images were posted by an individual using the screen name "M35":

- * 06744400703013218147864754861438.jpg – depicts a nude minor male standing facing the camera with his underwear pulled down below his hips to expose his genitals.
- * 38822506521353000620363283466535.jpg – depicts two nude minor males lying on a bed. One of the minor males is lying on top of the other minor male and they are both performing oral sex upon one another.
- * B502ef3049f34593430345633a9d0b8f.jpg – depicts a partially nude minor male lying on a bed. The minor male has pulled his shorts down below to expose his genitals. The minor male has an erection.

SHUTT utilized the screenname "M35" and distributed images of child pornography to the illegal website.

Following his identification, a search warrant was executed at **SHUTT**'s residence on September 17, 2010. During the execution of the search warrant, **SHUTT** confessed to distributing child pornography to the illegal website. **SHUTT** also confessed to downloading and possessing images of child pornography for over 15 years and trading images with others he met in newsgroups.

During the search, **SHUTT**'s computers and other digital media items were seized and forensically examined. **SHUTT**'s computers and hard drives contained approximately 1,483 images and 32 videos depicting children engaged in sexually explicit conduct. The following are examples of images present on **SHUTT**'s seized digital media on September 17, 2010:

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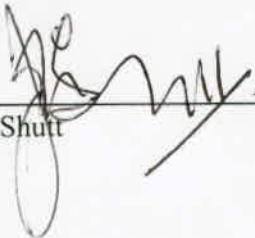
- * Cindy01.jpg- depicts a minor female engaged in oral sex upon an adult male. This image has previously been identified by NCMEC as depicting a real, identified child and is titled the "Cindy" series of child pornography.
- * Neto_2a_48.jpg – depicts a nude pre-pubescent female engaged in oral sex upon a nude pubescent minor male. This image has previously been identified by NCMEC as depicting real, identified children and is titled the "Sabbat" series of child pornography.
- * SetG4.jpg – depicts a partially nude pre-pubescent female wearing a blue shirt lying on top of a nude adult male. The adult male is performing sexual intercourse upon the minor female. In addition a nude pubescent male is standing next to the pre- pubescent female and she is performing oral sex upon him. This image has previously been identified by NCMEC as depicting a real, identified children and is titled the "Blue Shirt Girl" or "Blue Sweater Girl" series of child pornography.

The images and videos depict real children engaged in sexually explicit conduct. The images downloaded onto the defendant's computer were transported through the Internet and therefore traveled in interstate commerce.

* * *

I have read this statement of facts, and carefully reviewed it with my attorney. I acknowledge that it is true and correct.

06/14/11
Date



John Shutt